

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA :

vs. : S1 19 Cr. 373 (PGG)

MICHAEL AVENATTI, :

Defendant. :

**DECLARATION OF SCOTT A. SREBNICK, ESQ., IN SUPPORT OF
DEFENDANT AVENATTI'S MOTION *IN LIMINE* TO EXCLUDE ALL
EVIDENCE OF SETTLEMENT NEGOTIATIONS AND COMMUNICATIONS**

I, Scott A. Srebnick, Esq., pursuant to 28 U.S.C. §1746, declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. I am a member of the law firm of Scott A. Srebnick, P.A., co-counsel for Defendant Michael Avenatti in this case. I submit this Declaration in support of Mr. Avenatti's motion *in limine* to exclude all evidence of settlement negotiations and communications, and supporting memorandum of law, filed contemporaneously herewith.

2. The excerpt of the March 21, 2019, meeting, quoted in the Memorandum of Law (at pp.5-8) was prepared by me and others working at my direction based on a recording provided by the government in discovery. Upon information and belief, the excerpt is a substantially verbatim transcript of a portion of that meeting.

By: /s/Scott A. Srebnick
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CERTIFICATE OF SERVICE

I hereby certify that on December 10, 2019, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

/s/Scott A. Srebnick
Scott A. Srebnick